# Exhibit J

### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

THERAPY PRODUCTS, INC.	ş	
d/b/a ERCHONIA MEDICAL,	§	
	§	
Plaintiff,	§	
	§	CIV.ACT.NO. 3-07CV0381-N
V.	§	ECF
	§	
ROMAN CHUBATY, M.D.,	§	
MERIDIAN CO., LTD. and	§	
AESTHETICMD,	§	
	§	
Defendants.	§	

#### JOINT STIPULATION EXTENDING EXTENSION OF TIME TO RESPOND

Without waiving any challenge to personal jurisdiction or the issues raised in Meridian Co., Ltd.'s Motion to Dismiss, Meridian Co., Ltd. ("Meridian Co.") and Plaintiff, Therapy Products, Inc. d/b/a Erchonia Medical ("Erchonia" or "Plaintiff") file this Joint Stipulation Extending Extension of Time to Respond, pursuant to Federal Rule of Civil Procedure 6, requesting that the Court extend deadlines presently set in the case.

Plaintiff and Meridian Co. ask the Court to extend the deadline for Meridian Co. to respond to Plaintiff's motion for Leave to File and Amended Complaint. Plaintiff and Meridian Co. also ask the court to extend Plaintiff's deadlines to take limited depositions on jurisdictional issues and Plaintiff's deadline to respond to Meridian Co.'s Motion to Dismiss.

WHEREAS, on March 29, 2007, Plaintiff filed its Original Complaint ("Complaint").

WHEREAS, on June 14, 2007 the Court issued an order allowing Plaintiff leave to take depositions, limited to the propriety of service of process and personal jurisdiction, and further ordering Plaintiff to conclude such depositions on or before the 45<sup>th</sup> day from the date of the Order.

WHEREAS, on June 14, 2007 the Court issued an order extending Plaintiff's deadline to file a response to Meridian Co.'s Motion to Dismiss until 60 days from the date of the Order.

WHEREAS, on June 28, 2007, Plaintiff filed its Motion for Leave.

WHEREAS, the deadline for Meridian Co. to respond to Plaintiff's Motion for Leave is July 23, 2007.

WHEREAS, the deadline for Plaintiff to complete the limited depositions is currently July 29, 2007.

WHEREAS, the deadline for Plaintiff to file a response to Meridian Co.'s Motion to Dismiss is currently August 13, 2007.

WHEREAS, Plaintiff and Meridian Co., through their respective counsel, now agree to: an extension of Meridian Co.'s time to respond to Plaintiff's Motion for Leave to August 31, 2007; an extension of the deadline for Plaintiff to complete the limited depositions to August 31, 2007; and, an extension of Plaintiff's deadline to file a response to Meridian Co.'s Motion to Dismiss to September 15, 2007.

WHEREAS, this Stipulation is without prejudice to, or waiver of, any defenses that Meridian Co. may have to this action, including but not limited to the absence of personal jurisdiction.

IT IS STIPULATED AND AGREED THAT the parties hereto, through their respective counsel, hereby request that the Court issue an Order as follows:

- 1. The deadline for Meridian Co. to respond to Plaintiff's Motion for Leave is extended to and including August 31, 2007.
- 2. The deadline for Plaintiff to complete the limited depositions on the issue of the propriety of service of process and issues of personal jurisdiction is extended to and including August 31, 2007.

3.	The deadline for Plaintiff	to file a response to Meridian Co.'s Motion to Dismiss
is extended to and including September 15, 2007.		
SIGN	IED	, 2007
		U.S. DISTRICT COURT JUDGE PRESIDING

#### AGREED AS TO FORM, SUBSTANCE, AND ENTRY:

/s/ David Grant Crooks

Brett Lee Myers Texas Bar No. 00788101

David Grant Crooks

Texas Bar No. 24028168

DAVID, GOODMAN & MADOLE, P.C.

5420 LBJ Freeway, Suite 1200

Dallas TX 75240

Phone: (972) 991-0889 Fax: (972) 404-0516

#### ATTORNEYS FOR PLAINTIFF

/s/ Kelly R. Vickers

Raymond R. Castello (admitted pro hac vice)

Kelly R. Vickers

Texas Bar No. 24041827

Lauren S. Koletar

Texas Bar No. 24046235

FISH & RICHARDSON, P.C.

1717 Main Street, Suite 5000

Dallas TX 75201

Phone: 214.747.5070

Fax: 214.747.2091

ATTORNEYS FOR MERIDIAN CO., LTD.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 23, 2007 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by first class mail.

Sid Leach Snell & Wilmer, L.L.P. One Arizona Center Phoenix AZ 85004-2202 Attorney for defendants Roman Chubaty, M.D. and AestheticMD

/s/ David Grant Crooks
David Grant Crooks